

REMARKS/ARGUMENTS

Claims 16, 19-20, and 24-40 are pending in this case. In response to the Office Action, Claim 38 was amended. Claims 16, 19-20, 24-37, and 39-40 remain unchanged.

Claim Objections:

In response to the Examiner's objections of Claims 38-40, claim 38 has been amended as required.

Rejection of Claims 16, 19, 20, and 24-40 under 35 U.S.C. 103(a) as being unpatentable over Lim (US 6,697,355) in view of Malki et al (US2001/0046223) and Sorenson (US2002/0061009):

The rejection of Claims 16, 19, 20, and 24-40 under 35 U.S.C. 103(a) as being unpatentable over Lim (US 6,697,355) in view of Malki et al (US2001/0046223) and Sorenson (US2002/0061009) is respectfully traversed and reconsideration and withdrawal of the rejection is respectfully requested at this time.

Applicant respectfully submits that Lim (US 6,697,355) in view of Malki et al (US2001/0046223) and Sorenson (US2002/0061009) taken singly or in combination do not anticipate Applicant's invention as recited in the claims. Specifically, Lim (US 6,697,355) in view of Malki et al (US2001/0046223) and Sorenson (US2002/0061009) do not describe nor anticipate "maintaining the binding list when the mobile node is in the home network of the mobile node." The cited art does not teach or suggest Applicants claimed invention, namely a mobile node attached to a *mobile gateway router* maintaining a binding update list while in a *home network*.

Applicant respectfully points out to the Examiner that Malki, paragraph 32 is in the context of figure 3 which clearly shows the mobile away from its home network. Furthermore in paragraph 5, when describing the context, it states that a mobile obtains a CoA when it is in a foreign network. Both the LCoA and RCoA are in the context of a foreign network. Malki does not teach the concept of a mobile node maintaining a binding update list when it is in its home

network. Applicant respectfully submits that it is non-intuitive for a mobile node to keep a binding list of the nodes when it is in its home network.

Applicant respectfully submits that Malki does not disclose a mobile router, it only discloses a Mobility Anchor point which is NOT a mobile router. Lim discloses a mobile router (it also uses the term mobile gateway router to refer to a mobile router) connecting to a network. Sorensen talks about mobile routers having mobility. However, Applicant respectfully submits that these in combination do not address the problem that mobile routers are fundamentally different from Mobility Anchor Point (MAP) that is disclosed in Malki. Applicant respectfully notes that Examiners use of the term mobile gateway router to refers to a MAP also. The term mobile gateway router is NOT used in Malki. Specifically, MAP resides within a network (Malki-Para 30, line 9) whereas mobile router is a mobile node with router functions which connects to a network. (In Lim, Fig 3 and Col 4, the MR connects to the network via a gateway router). Note that the gateway routers are static nodes that enable mobile nodes and mobile routers connect to the Internet or access network. Sorensen simply talks about the mobility of the mobile router. It is also clear from other places in Malki that MAP is NOT a mobile router or a mobile gateway router. Mobile nodes connect to their Mobile router (or Mobile gateway router) using a single IP hop and communicate, specifically mobile nodes don't send any binding updates to a mobile router. However a mobile node registers with a MAP by sending a binding update to a MAP (Malki, Para 32, lines 9-10). So the MAP of Malki is NOT a mobile router of Sorensen or Lim.

Since Applicant's invention is not taught by the cited art, Applicants feel that the rejection is unsupported by the art and should be withdrawn. Applicants look forward to the early allowance of the pending claims.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

The Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney or agent at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

The Commissioner is hereby authorized to charge Deposit Account 502117, Motorola, Inc, with any fees which may be required in the prosecution of this application.

Respectfully submitted,

August 21, 2006

Motorola, Inc.
8000 West Sunrise Boulevard
Law Department – MD1610
Plantation, Florida 33322
Customer Number: 24273

By: /Randi L. Karpinia/
Randi L. Karpinia
Attorney of Record
Reg. No.: 46,148
Tel: 954-723-6449
Fax: 954-723-3871
E-Mail: docketing.florida@motorola.com